

1 William B. Curtis, Esq. (TX SBN 00783918)
2 (*admitted pro hac vice*)
3 **CURTIS LAW GROUP**
4 17754 Preston Rd., Suite 200
5 Dallas, Texas 75252
6 Telephone: (214) 890-1000
7 Facsimile: (214) 890-1010
8 Email: bcurtis@curtis-lawgroup.com

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 **IN RE: BARD IVC FILTER PRODUCTS**
12 **LIABILITY LITIGATION**

13 This document relates to:

14 *HILDA FLETCHER,*

15 *Plaintiff,*

16 v.

17 *C.R. BARD AND BARD PERIPHERAL*
18 *VASCULAR, INC.*

19 *Defendants.*

MDL No. 2:15-MD-02641-PHX-DGC

Civil Action No. 2:16-cv-02194-DGC

**STIPULATION OF DISMISSAL WITH
PREJUDICE**

20 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Hilda Fletcher and
21 Defendants, C.R. Bard and Bard Peripheral Vascular, Inc., through their undersigned counsel, that
22 the above-captioned action is voluntarily dismissed, with prejudice, pursuant to Federal Rule of
23 Civil Procedure 41(a)(1)(A)(ii), and without costs or fees to any party.

24 The voluntary dismissal will only apply to docket number 2:16-cv-02194-DGC and will not have
25 any effect on any other cases filed in regard to Plaintiff Hilda Fletcher with different docket numbers.

26 Dated this 7th day of April 2021.
27
28

Respectfully submitted,

/s/ William B. Curtis
WILLIAM CURTIS, Esq.
Texas State Bar No. 00783918
CURTIS LAW GROUP
17754 Preston Rd., Suite 200
Dallas, Texas 75252
(214) 890-1000 Telephone
(214) 890-1010 Facsimile
bcurtis@curtis-lawgroup.com
ATTORNEY FOR PLAINTIFF

/s/ Richard B. North
Richard B. North, Jr., GA Bar #545599
Nelson Mullins Riley & Scarborough, LLP
2017 17th St. NW, Suite 1700
Atlanta, GA 30363
Tel: 404-322-6000
Fax: 404-322-6050
Richard.north@nelsonmullins.com
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System which will automatically send email notification of such filing to all attorneys of record.

/s/ William Curtis
WILLIAM CURTIS